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3 District of Nevada

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11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA (LAS VEGAS)**

14 JULIE A BARR-THOMAS,

15 Plaintiff,

16 v.

17 NANCY BERRYHILL,

18 Acting Commissioner of Social Security,

19 Defendant.

20 Case No. 2:18-cv-02251-APG-VCF

21 **UNOPPOSED MOTION FOR**
22 **EXTENSION OF TIME**
23 **(FIRST REQUEST)**

24 Defendant Nancy Berryhill, Acting Commissioner of Social Security (“Defendant”) respectfully
25 requests for the first time that the Court extend the time for Defendant to file her Cross-Motion for
26 Summary Judgment and Memorandum in Support, due on April 8, 2019, by 30 days, through and
including May 8, 2019.

Defense counsel needs an extension of time because she is a newer hire who needs more time to
draft the response and go through the necessary in-house reviews and her reviewer, due to his own
heavy workload demands, needs more time to review counsel’s brief. Defense counsel needs more time
to determine whether options exist for settlement and to accommodate competing workload demands.

1 This request is made in good faith with no intention to delay unduly the proceedings. Counsel
2 apologizes to the Court and Plaintiff for any inconvenience this delay may cause.

3 Counsel for Defendant conferred with Plaintiff's counsel on April 2, 2019, Plaintiff's counsel
4 does not oppose this motion.

5 Respectfully submitted this 3rd day of April 2019.

6 NICHOLAS A. TRUTANICH
7 United States Attorney

8 /s/ S. Wyeth McAdam
9 S. WYETH McADAM
Special Assistant United States Attorney

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11 IT IS SO ORDERED:

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13 CAM FERENBACH
14 UNITED STATES MAGISTRATE JUDGE

15 DATED: April 3, 2019
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